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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	: Chapter 11
DPH HOLDINGS CORP., <u>et al.</u> ,	: Case No. 05-44481 (RDD)
Reorganized Debtors.	: (Jointly Administered)
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**CERTIFICATE OF NO OBJECTION REGARDING THE UNITED STATES'
MOTION TO APPROVE THE JOINT STIPULATION AND AGREED ORDER,
CONSENT DECREE AND SETTLEMENT AGREEMENT**

On December 3, 2013, the United States of America on behalf of the U.S. Environmental Protection Agency (the "United States") filed a Motion to Approve the Joint Stipulation and Agreed Order, Consent Decree and Settlement Agreement [Dkt. No. 22235] (the "Motion"). Contemporaneous with the filing of the Motion, the United States also filed a Motion for Entry of an Order Shortening the Notice Period for Hearing on the United States' Motion to Approve the Joint Stipulation and Agreed Order, Consent Decree and Settlement Agreement (the "Motion to Shorten Time"), which asked the Court to modify the deadline for service and filing of opposition to the Motion, to allow opposition to be filed by no later than Friday, December 6, 2013 at 12:00 p.m., and, in the event no opposition was filed, to sign and enter the proposed Joint

Stipulation and Agreed Order, Consent Decree and Settlement Agreement Among Reorganized Debtors, the United States on Behalf of the United States Environmental Protection Agency, the State of Michigan on Behalf of the Michigan Department of Environmental Quality, the State of Ohio on behalf of the Ohio Environmental Protection Agency, and the Environmental Response Trust Trustee (I) Resolving Proof of Claim Number 15785 and Proofs of Administrative Expense Numbers 18956, 19539, and 19786 and (II) Establishing an Environmental Response Trust (the “Settlement Agreement”), and enter the order approving the Settlement Agreement, without a hearing.

The undersigned counsel for the United States hereby certifies that she is aware of no formal or informal objection or response to the United States’ Motion. The undersigned counsel further certifies that she has reviewed the Court’s docket and no objection to the Motion appears thereon. The notice to the Motion set a proposed deadline of December 6, 2013, at 12:00 p.m. (EST), for receipt of objections to the Motion, and the United States received no requests for an extension of that deadline. The undersigned counsel further certifies that she is aware of no objection to the Motion to Shorten Time.

Accordingly, it is respectfully requested that the Court sign and enter the proposed order filed with the Motion to Shorten Time, the Settlement Agreement, and the proposed order filed with the Motion, copies of which are attached hereto as Exhibit A, Exhibit B, and Exhibit C.

Dated: New York, New York
December 6, 2013

Respectfully submitted,

PREET BHARARA
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Southern District of New York

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